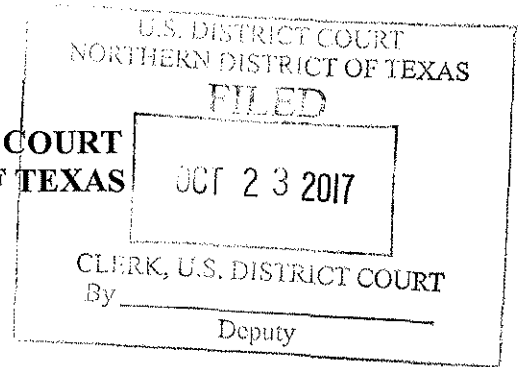


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

Plaintiff,

v.

MICHELLE NICHOLE
DUNEGAN (01)

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Criminal Action No. 4:17-CR-00181-O

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

COMES NOW, MICHELLE NICHOLE DUNEGAN, Defendant, and files this Motion to Modify Conditions of Pretrial Release and would show as follows:

I.

Ms. Dunegan was arrested on July 27, 2017, and was released on pretrial bond on that same date.

II.

Ms. Dunegan has complied with all conditions of her bond since the date listed above.

III.

As a condition of her bond, Ms. Dunegan was ordered to have no contact with her long-term boyfriend and co-defendant, Ronald Robert Oliver. Dunegan was further ordered to move from her residence at 8421 E. La Prada #2060 Dallas, Texas 75228 to her father's house at 1311 Gary Drive, Dallas Texas.

IV.

On October, 18, 2017, Michelle Dunegan pled guilty to the felony offense 21 USC § 846 Possession with Intent to Distribute a Controlled Substance (1s). Her sentencing is scheduled February 5, 2018.

V.

Michelle Dunegan requests that the Court amend her bond conditions to allow her written and telephonic communications with Ronald Robert Oliver. Ms. Dunegan currently lives at 1311 Gary Drive, Dallas, Texas, and would request that she be allowed to move back to her original residence located at 8421 E. La Prada, Dallas, Texas

Defense counsel conferenced with United States Assistant Attorney, Frank Gatto, and he is not opposed to this motion.

Respectfully submitted,

/s/Kara L. Carreras
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Motion was electronically filed with the clerk of Court for the United States District Court, Northern District and notice provided to Assistant United States Attorney, Frank Grotto, via email on October 19, 2017.

/s/Kara L. Carreras
Kara L. Carreras